

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKAS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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**Case No.: 1:22-cv-1032 (PKC) (JRC)**

**STIPULATION OF  
VOLUNTARY DISMISSAL  
WITH PREJUDICE AS AGAINST  
NICHOLAS LIAKAS**

**IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiff IME WatchDog, Inc. and Defendant Nicholas Liakas, by and through their respective undersigned counsel, that – pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure – Plaintiff’s claims in the above-captioned case shall be dismissed in their entirety with prejudice and without costs or attorneys’ fees as against Defendant Nicholas Liakas.

DATED: April 11, 2023

Respectfully submitted,

*/s/ Emanuel Kataev, Esq.*

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MILMAN LABUDA LAW GROUP PLLC

Emanuel Kataev, Esq.

*Counsel for Plaintiff IME WatchDog, Inc.*

*/s/ [Signature]*

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CLAYMAN ROSENBERG KIRSHNER & LINDER LLP

James F. Valentino, Esq.

*Counsel for Defendant Nicholas Liakas*

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SO ORDERED:

Hon. Pamela K. Chen, U.S.D.J.